

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

SAMANTHA SOHMER and KATHY  
L. FELLGREN, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiffs,

vs.

UNITEDHEALTH GROUP INC.,  
UNITED HEALTHCARE SERVICES,  
INC., UNITED HEALTHCARE  
INSURANCE COMPANY, OPTUM,  
INC., and OPTUMRX, INC.,

Defendants.

Case No. 18-cv-03191 (JNE/BRT)

**[PROPOSED] ORDER RE:  
SCHEDULE FOR THE  
EXCHANGE OF EXPERT  
REPORTS**

**IT IS HEREBY ORDERED THAT:**

The Parties, through their respective counsel, conferred in a telephone conference meeting as required by the Third Amended Pretrial Scheduling Order (Dkt. #101) on May 1, 2020, to discuss their anticipated experts and to meet-and-confer regarding a proposed schedule for the exchange of expert reports. The Parties report as follows:

The Parties anticipate calling the following initial (non-rebuttal) experts:

- Plaintiffs anticipate calling an expert to address Defendants' claims data and what Plaintiffs claim as overcharges.
- Defendants may disclose an industry expert relating to the structure and administration of health plans.

The Parties anticipate calling the following rebuttal experts:

- Defendants anticipate calling up to two expert witnesses to rebut Plaintiffs' expert with respect to damages, claims, and class certification. Defendants

may also disclose one industry-related expert on the structure and administration of health plans as needed to rebut issues raised in Plaintiffs' expert report.

- Plaintiffs may disclose a rebuttal expert or experts as needed to respond or reply to Defendants' experts.

The Parties propose the following schedule:

Disclosure of initial experts/reports	Monday, September 21, 2020
Disclosure of rebuttal experts/reports	Monday, November 2, 2020
Disclosure of reply experts/reports	Friday, December 18, 2020

As to any reply expert reports, the parties agree that such reports are limited to issues raised in any rebuttal report.

**IT IS SO ORDERED**

Date: \_\_\_\_\_

\_\_\_\_\_  
BECKY R. THORSON  
United States Magistrate Judge